

1 JINA L. CHOI (N.Y. Bar No. 2699718)
2 JOHN S. YUN (Cal. Bar No. 112260)
3 yunj@sec.gov
4 MARC D. KATZ (Cal. Bar No. 189534)
5 katzma@sec.gov
6 JESSICA W. CHAN (Cal. Bar No. 247669)
7 chanjes@sec.gov

8
9
10 Attorneys for Plaintiff
11 SECURITIES AND EXCHANGE COMMISSION
12 44 Montgomery Street, Suite 2800
13 San Francisco, CA 94104
14 Telephone: (415) 705-2500
15 Facsimile: (415) 705-2501
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

14 SECURITIES AND EXCHANGE COMMISSION, 15 Plaintiff, 16 v. 17 JOHN V. BIVONA; SADDLE RIVER 18 ADVISORS, LLC; SRA MANAGEMENT 19 ASSOCIATES, LLC; FRANK GREGORY MAZZOLA, 20 Defendants, and 21 SRA I LLC; SRA II LLC; SRA III LLC; 22 FELIX INVESTMENTS, LLC; MICHELE J. MAZZOLA; ANNE BIVONA; CLEAR 23 SAILING GROUP IV LLC; CLEAR SAILING GROUP V LLC, 24 Relief Defendants. 25	Case No. 3:16-cv-01386-EMC (JCS) STIPULATION AND [PROPOSED] ORDER CONTINUING DISCOVERY AND MOTION DEADLINES IN ORDER TO FINALIZE SETTLEMENT AGREEMENTS
---	--

**STIPULATION TO CONTINUE DISCOVERY AND MOTION DEADLINES IN ORDER TO
FINALIZE SETTLEMENTS**

Counsel for plaintiff Securities and Exchange Commission (“Commission”), for defendants John V. Bivona and Saddle River Advisors, LLC (“Saddle River”) and for the Receiver for the receivership entities defendant SRA Management, LLC and relief defendants SRA I LLC, SRA II LLC, SRA III LLC, Clear Sailing Group IV LLC and Clear Sailing Group V LLC, as well as third party affiliated entities Felix Multi-Opportunity Fund I LLC, Felix Multi-Opportunity Fund II LLC, Felix Management Associates LLC, NYPA Fund I LLC, NYPA Fund II LLC and NYPA Management Associates LLC, along with in pro per defendant Frank Gregory Mazzola and in pro per relief defendant Michele J. Mazzola hereby submit this Stipulation for continuing the current discovery and motion deadlines in order to finalize settlement agreements.

The Commission has now reached tentative agreements with all active defendants and relief defendants. The undersigned are in the process of finalizing the necessary settlement documents. Thereafter, the proposed resolutions will be submitted to the Securities and Exchange Commission for review and approval, and then the settlement papers will be presented to this Court. In order to facilitate this settlement process without incurring unnecessary expense, the parties stipulate to the following continuations of discovery and motion deadlines:

- The July 20, 2017 deadline for completing fact discovery and submitting expert reports would be extended to September 20, 2017;
 - The deadline for completing expert discovery would be extended to October 20, 2017; and
 - The final day for hearing dispositive motions would be extended to December 14, 2017.

1 Dated: June 20, 2017
2

3 Marc Katz

4 Marc D. Katz
5 Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION

6 Jahan P. Raissi (by email authorization)

7 Jahan P. Raissi
SHARTSIS FRIESE LLP
8 Attorneys for Defendants JOHN V. BIVONA and SADDLE
RIVER ADVISORS, LLC and Relief Defendant ANNE
BIVONA
9

10 John W. Cotton (by email authorization)

11 John W. Cotton
GARTENBERG, GELFAND & HAYTON LLP
12 Attorney for the Receiver
SHERWOOD PARTNERS, INC. for Receivership Entities
13 SRA MANAGEMENT, LLC, SRA I LLC,
SRA II LLC, SRA III LLC, CLEAR SAILING GROUP IV
14 LLC, CLEAR SAILING GROUP V LLC, FELIX
MANAGEMENT ASSOCIATES LLC, FELIX MULTI-
OPPORTUNITY FUND I LLC, FELIX MULTI-
OPPORTUNITY FUND II LLC, NYPA MANAGEMENT
ASSOCIATES LLC, NYPA FUND I LLC, and NYPA FUND
II LLC
15

16 Frank G. Mazzola (by email authorization)

17 Defendants FRANK G. MAZZOLA, in pro per
18

19 Michele J. Mazzola (by email authorization)

20 Relief Defendant MICHELE J. MAZZOLA, in pro per
21

ORDER CONTINUING DISCOVERY AND MOTION DEADLINES

Based on the stipulation of the parties and their representation that tentative settlement agreements have been reached with all active defendants and relief defendants, the Court hereby amends the prior scheduling order and continues the discovery and motion deadlines as follows:

- The July 20, 2017 deadline for completing fact discovery and submitting expert reports is extended to September 20, 2017;
 - The deadline for completing expert discovery is extended to October 20, 2017; and
 - The final day for hearing dispositive motions is extended to December 14, 2017.

SO ORDERED.

Dated: 6/27, 2017

